

LAW OFFICES  
**HALEY, BADER & POTTS**

4350 NORTH FAIRFAX DR., SUITE 900

ARLINGTON, VIRGINIA 22203-1833

TELEPHONE (703) 841-0606

FAX (703) 841-2345

POST OFFICE BOX 19006

WASHINGTON, D.C. 20036-9006

TELEPHONE

(202) 331-0606

DAVID G. O'NEIL  
ADMITTED IN D.C. ONLY

**RECEIVED**

**DEC - 7 1992**

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

**December 7, 1992**

OUR FILE NO.  
**0250-120-60**

Ms. Donna R. Searcy  
Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

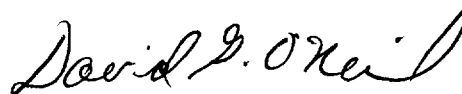
Re: **Beverly Hills, Florida**  
**MM Docket No. 92-195**

Dear Ms. Searcy:

Transmitted herewith, on behalf of Sarasota-FM, Inc. and Gator Broadcasting Corporation, are an original and four copies of their Reply Comments in the above-captioned proceeding.

Please contact the undersigned directly if there are any questions concerning this matter.

Sincerely yours,



David G. O'Neil

DGO:do  
Enclosures

*074*  
RECEIVED  
DEC 10 1992

RECEIVED

Before The  
**Federal Communications Commission**

Washington, D.C. 20554

DEC - 7 1992

FEDERAL COMMUNICATIONS COMMISSION  
SECRETARY

In The Matter Of )  
 )  
Amendment of Section 73.202(b) ) MM Docket No. 92-195  
FM Table of Allotments ) RM-7146  
FM Broadcast Stations )  
(Beverly Hills, Florida) )

TO: Chief, Allocations Branch  
Policy and Rules Division

**Reply Comments of Sarasota-FM, Inc.  
and Gator Broadcasting Corporation**

Sarasota-FM, Inc. ("SFI"), licensee of FM Radio Broadcast Station WSRZ, Sarasota, Florida, and Gator Broadcasting Corporation ("Gator"), licensee of FM Radio Broadcast Station WRRX, Micanopy, Florida (collectively, "SFI/Gator"), pursuant to Sections 1.405, 1.415, and 1.420 of the Commission's Rules and by their attorneys, hereby file their Reply Comments in the above-captioned proceeding to amend the FM Table of Allotments, 47 C.F.R. 73.202(b).<sup>1</sup> The SFI/Gator counterproposal best serves the public interest by providing improved service by upgrading the facilities of four radio stations. As demonstrated below, Heart of Citrus, Inc. ("Heart"), licensee of FM Radio Broadcast Station WXOF, Beverly Hills, Florida, for whom SFI/Gator propose to upgrade to a Class C3 facility, and Highlands Media

<sup>1</sup> The Public Notice listing SFI/Gator's and Heart of Citrus, Inc.'s respective counterproposals provided for the filing of Reply Comments within 15 days of the Public Notice. *Report No. 1918* (released November 20, 1992). December 5, 1992 is the fifteenth day from date of the Public Notice. Because December 5, 1992 falls on a Saturday, the deadline for filing Reply Comments is December 7, 1992. Thus, these Reply Comments are timely filed.

Company, Inc. ("Highlands"), licensee of FM Radio Broadcast Station WWOJ, Avon Park, Florida, have raised no arguments to rebut the superiority of SFI/Gator's counterproposals as best serving the public interest. In support thereof, the following is hereby shown:

1. Both SFI/Gator and Heart filed counterproposals to the *Notice of Proposed Rule Making*, 7 FCC Rcd 5910 (1992) (Chief, Allocations Branch) in the above-captioned proceeding. The SFI/Gator counterproposal would result in improved service to the public through the upgrade of facilities licensed to SFI, Gator, and Heart.<sup>2</sup> The SFI/Gator counterproposal also resolves pending proposals for service in central Florida that have been advanced in MM Docket No. 87-455.<sup>3</sup> Favorable action on the SFI/Gator counterproposal would also conserve the Commission's resources in this proceeding and in MM Docket No. 87-455. Under the SFI/Gator counterproposal, everyone wins.

2. Whereas SFI/Gator propose an omnibus resolution of this proceeding to the benefit of each party (including improvement in service for four radio stations in four different communities), Heart continues to seek an upgrade for only WXOF, thereby depriving SFI and Gator of upgrades for their respective stations.<sup>4</sup> Instead of considering the positive attributes of the SFI/Gator counterproposal, Heart dismisses

---

<sup>2</sup> A summary of the SFI/Gator counterproposal is provided at the end of this pleading.

<sup>3</sup> Highlands Media Company, Inc., licensee of FM Radio Broadcast Station WWOJ, Avon Park, Florida, challenges SFI/Gator's assertion that its counterproposal will resolve MM Docket No. 87-455 to the benefit of each party in that proceeding. SFI/Gator would note that adoption of SFI/Gator's counterproposal will have no impact on the Commission's decision in MM Docket No. 87-455 to substitute Channel 256A for 292A at Avon Park, Florida and to modify the license of WWOJ accordingly, a decision which could become final if the SFI/Gator proposal advanced in this proceeding is adopted.

<sup>4</sup> In its petition for rule making, Heart proposes substitution of Channel 246C3 for Channel 246A at Beverly Hills and the modification of license of WXOF accordingly. In its counterproposal, Heart proposes the substitution of Channel 246C2.

the SFI/Gator counterproposal based on an erroneous and flawed interpretation of the facts and Commission precedent.

3. Heart is incorrect in its argument that the SFI/Gator counterproposal is flawed because Pasco Pinellas Broadcasting Co. ("Pasco"), licensee of FM Radio Broadcast Station WLVU, Holiday, Florida, has not specifically consented in this proceeding to the proposed substitution of Channel 246C2 for Channel 292A at Holiday, Florida and the modification of WLVU's license accordingly. As SFI/Gator stated in their counterproposal, Pasco repeatedly has endorsed substitution of Channel 246C2 for Channel 292A at Holiday (instead of Channel 292C2) during the course of MM Docket No. 87-455, provided that the Commission did not accept competing expressions of interest. As discussed in detail in SFI/Gator's counterproposal, Channel 246C2 may be substituted for Channel 292A at Holiday and modification of WLVU's license made accordingly without acceptance of competing expressions of interest pursuant to an incompatible channel swap. Pasco has not repudiated its consent to an incompatible channel swap. Accordingly, it is reasonable to conclude that Pasco still agrees to the channel swap.

4. *Assuming, arguendo*, that Pasco no longer agrees to an incompatible channel swap, the Commission may still require Pasco to operate WLVU on Channel 246C2. Pasco has requested, and the Commission has approved, substitution of Channel 292C2 for 292A at Holiday.<sup>5</sup> Pasco already has indicated its interest in operating a Class C2 facility and its indifference as to whether the Class C2 facility operates on either Channel 246 or Channel 292. It would be contrary to the public interest to permit Pasco to elect to operate on Channel 292,

---

<sup>5</sup> MM Docket No. 87-455.

thereby denying upgraded facilities for two stations, *solely because Pasco now favors one channel over another*. Absent valid engineering concerns, which SFI/Gator have demonstrated in their counterproposal do not exist and which Heart does not dispute, the Commission should grant the SFI/Gator counterproposal as best serving the public interest.<sup>6</sup>

5. Heart erroneously claims that its proposed upgrade will provide third and fourth aural service superior to the First Alternative contained in the SFI/Gator counterproposal. Heart conveniently ignores the fact that the Commission has already granted construction permits for several noncommercial stations in the same areas where Heart claims third and fourth aural service, thereby eliminating any preference Heart may claim for these aural services. *Engineering Statement of Bromo Communications, Inc.* (Exhibit 1); *see Faribault, Minnesota*, 7 FCC Rcd 3937, 3939 (1992) (Chief, Policy and Rules Division) (noncommercial educational stations included for purposes of comparing number of aural reception services); *Bowdon, Georgia*, 6 FCC Rcd 4863, 4864 (1992) (Chief, Allocations Branch) (construction permits included for purposes of comparing aural reception service).<sup>7</sup> Because the SFI/Gator and Heart proposals propose the same service, the only remaining difference of

---

<sup>6</sup> Heart's suggestion that an adversarial posture between Pasco and SFI in MM Docket No. 87-455 undermines Pasco's consent to operate on Channel 246C2 is incorrect and without merit. Pasco and SFI have never disagreed over allotment of Channel 246C2 at Holiday. Instead, Pasco and SFI have argued over allotment of Channel 292C2 to Holiday *and* Channel 293A *only* to Sarasota. It is incorrect to infer, as Heart does, that disagreement over one counterproposal necessitates disagreement over other counterproposals. SFI, Gator, and Pasco have always agreed upon the SFI/Gator counterproposal.

<sup>7</sup> Even comparing the proposals under the criteria Heart proposes reveals that the Second and Third Alternatives contained in the SFI/Gator counterproposal satisfy the same priorities set forth in *Assignment Policies and Procedures*, 90 FCC 2d 88 (1982) as does Heart's petition for rule making and its counterproposal. In its counterproposal, Heart specifically argues that its counterproposal better serves the public interest than SFI/Gator's First Alternative by providing third and fourth aural service. Heart does not raise the same arguments with regard to SFI/Gator's Second and Third Alternative, as these counterproposals would in effect provide virtually the same third and fourth aural services as would Heart's own proposal.

significance between the SFI/Gator proposals and that advanced by Heart is population. As Heart readily concedes, any of the alternatives contained in the SFI/Gator counterproposal provides increased service to a larger number of listeners. Because any of the alternatives contained in the SFI/Gator counterproposal provides increased service to a larger number of listeners, it would best serve the public interest to grant any of these alternatives.

6. Highlands filed Reply Comments<sup>8</sup> in the above-captioned proceeding, claiming that Commission action on the SFI/Gator counterproposal will delay implementation of a channel change for WWOJ to Channel 256A and a potential upgrade for WWOJ. Highlands argues that the SFI/Gator counterproposal will delay consideration of a pending petition for rule making filed by WGUL-FM, Inc.<sup>9</sup>

7. Highlands's Reply Comments contains no proposals worthy of consideration in this proceeding. As Highlands itself concedes, neither the proposed channel change for WWOJ nor WGUL-FM, Inc.'s petition for rule making are mutually exclusive with the SFI/Gator counterproposal. Accordingly, Highlands has stated no legal basis to delay consideration of the SFI/Gator counterproposal.

8. Favorable action upon the SFI/Gator counterproposal will permit the Commission to resolve the pending proposals in MM Docket No. 87-455. Indeed, Highlands suggests just such an approach in paragraph 17 of its Reply Comments.<sup>10</sup> Because action on the

---

<sup>8</sup> WGUL-FM, Inc., licensee of FM Radio Broadcast Station WGUL, New Port Richey, Florida, and Roper Broadcasting, Inc., licensee of FM Radio Broadcast Station WCAC(FM), Sebring, Florida, filed Reply Comments supporting Highlands's Reply Comments.

<sup>9</sup> RM-6869.

<sup>10</sup> Highlands's chief concern, of course, is the allotment of Channel 256A to Avon Park and the change in license of WWOJ to Channel 256A. SFI/Gator do not oppose the allotment of Channel 256A to Avon

SFI/Gator proposal will permit upgrades for each party in MM Docket No. 87-455, the Commission may dismiss the *Order to Show Cause*, 7 FCC Rcd 2642 (1992) (Acting Chief, Allocations Branch) in that proceeding as moot to the extent that it pertains to WSRZ, WLVU, and WRRX. At the same time, the Commission may grant the only remaining portion of the *Order to Show Cause* not rendered moot and change the license of WWOJ to operate on Channel 256A.

9. SFI takes great exception to Highlands characterizing its pleadings as obstructionist and alleging SFI has somehow created the current logjam in MM Docket No. 87-455. In MM Docket No. 87-455, SFI has pending several meritorious arguments regarding the procedure for upgrading the same stations in this proceeding.<sup>11</sup> Should the Commission deny the SFI/Gator counterproposal, SFI would have no choice but to continue prosecuting those arguments in MM Docket No. 87-455. Conversely, should the Commission act favorably upon the SFI/Gator Counterproposal, the Commission could dismiss the SFI pleadings in MM Docket No. 87-455, change WWOJ to channel 256A, and commence action on WGUL-FM, Inc.'s pending petition for rule making.

10. Although SFI/Gator urge the Commission to adopt any of its alternatives, adoption of the Second Alternative best serves the public interest. The Second Alternative would resolve favorably for all

---

Park, but as discussed in greater detail in footnote 3, fail to see how action in this proceeding affects the allotment of Channel 256A to Avon Park in MM Docket No. 87-455.

<sup>11</sup> Even assuming, *Arguendo*, that Highlands is correct and SFI and Gator's arguments in MM Docket No. 87-455 were procedurally defective, nothing precludes SFI and Gator from timely filing a counterproposal in this proceeding. To the extent Highlands suggest that SFI and Gator should not file comments in this proceeding because of their actions in a prior proceeding, Highlands's proposition is contrary to the Commission's Rules and precedent.

affected parties pending proposals for service improvements in central Florida that have been advanced in MM Docket No. 87-455. Favorable action on the Second Alternative would conserve the Commission's resources in this proceeding and MM Docket No. 87-455. In addition, granting the Second Alternative would eliminate a new shortspacing between WRXX and WXTB, Clearwater, Florida, proposed by the licensee of WXTB, Great American Television and Radio. *See FCC File No. BPH-920603IG.*

11. The Commission has already indicated that granting the Second Alternative would serve the public interest. *Perry, Florida*, 7 FCC Rcd 2557, 2558 (1992) (Deputy Chief, Policy and Rules Division). As demonstrated in the attached engineering exhibit of Bromo Communications, Inc., the Second Alternative will permit Heart to operate WXOF on Channel 292C3 and provide the required city-grade signal over Beverly Hills, Florida. Heart has raised no other arguments against the Second Alternative. That proposal will increase service to a greater population, and consequently, will better meet the public interest than Heart's counterproposal or petition for rule making. All parties would best be served if the Commission grants the Second Alternative.

12. In the event the Commission is unwilling to grant the Second Alternative, SFI/Gator then urge the Commission to adopt the First Alternative as best serving the public interest. The First Alternative would still permit improved service to the public through upgraded facilities for three stations whereas Heart proposes upgrades for only two stations. The First Alternative would also provide the same public interest benefits described in paragraphs 10 & 11.



WHEREFORE, for the foregoing reasons, Sarasota-FM, Inc. and Gator Broadcasting Corporation respectfully request that the Commission grant their counterproposal by amending the FM Table of Allotments, Section 73.202(b) of the Commission's Rules, in one of the following ways:

<b>First Alternative</b>			
<b>Community</b>	<b>Present Channel</b>	<b>Proposed Channel</b>	<b>Station</b>
Sarasota, FL	292A	293C2	WSRZ
Holiday, FL	292A	246C2	WLVU
Beverly Hills, FL	246A	292A	WXOF
Micanopy, FL	249A	247C2	WRRX
Chiefland, FL	247A	300A	WLQH

<b>Second Alternative</b>			
<b>Community</b>	<b>Present Channel</b>	<b>Proposed Channel</b>	<b>Station</b>
Sarasota, FL	292A	293C2	WSRZ
Holiday, FL	292A	246C2	WLVU
Beverly Hills, FL	246A	292C3	WXOF
Micanopy, FL	249A	247C2	WRRX
Chiefland, FL	247A	300A	WLQH

<b>Third Alternative</b>			
<b>Community</b>	<b>Present Channel</b>	<b>Proposed Channel</b>	<b>Station</b>
Sarasota, FL	292A	293C2	WSRZ
Holiday, FL	292A	246C2	WLVU
Beverly Hills, FL	246A	-----	-----
Sugarmill Woods, FL	----	292C3	WXOF
Inverness, Florida	----	292C3	---12
Micanopy, FL	249A	247C2	WRRX
Chiefland, FL	247A	300A	WLQH

---

<sup>12</sup> The proposal to allot Channel 292C3 to Inverness is an alternative to the proposal to allot Channel 292C3 to Sugar Mill Woods.

Respectfully submitted,

**Sarasota-FM, Inc.**

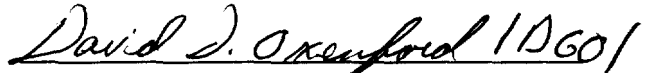


Michael H. Bader  
Theodore D. Kramer  
David G. O'Neil

ITS ATTORNEYS

HALEY, BADER & POTTS  
Suite 900  
4350 North Fairfax Drive  
Arlington, VA 22203-1633  
(703) 841-0606

**Gator Broadcasting Corporation**



David D. Oxenford, Jr.

ITS ATTORNEY

FISHER, WAYLAND, COOPER  
& LEADER  
1255 23rd Street, N.W.  
Suite 800  
Washington, D.C. 20037  
(202) 775-3546

December 7, 1992

REPLY COMMENTS OF  
SARASOTA-FM, INC.  
AND GATOR BROADCASTING CORPORATION  
MM DOCKET No. 92-195  
RM-7146  
December 1992

Technical Exhibit

TE-1

Bromo Communications, Inc.  
P.O. Box M - 1331 Ocean Boulevard, Suite 201  
St. Simons Island, Georgia 31522  
(912) 638-5608

Copyright 1992 - All rights reserved

REPLY COMMENTS OF  
SARASOTA-FM, INC.  
AND GATOR BROADCASTING CORPORATION  
MM DOCKET No. 92-195  
RM-7146  
December 1992

This Technical Exhibit supports the continued reply comments of Sarasota-FM, Inc., ("SFI") and Gator Broadcasting Corporation ("GATOR") in MM Docket #92-195, RM-7146. SFI and Gator have counterproposed three alternatives to conclude the docket. These are:

Alternative One

<u>Community</u>	<u>Present</u>	<u>Proposed</u>	<u>Station</u>
Sarasota	292A	293C2	WSRZ
Holiday	292A	246C2	WLVU
Beverly Hills	246A	292A	WXOF
Micanopy	249A	247C2	WRRX
Chiefland	247A	300A	WLQH

Alternative Two

<u>Community</u>	<u>Present</u>	<u>Proposed</u>	<u>Station</u>
Sarasota	292A	293C2	WSRZ
Holiday	292A	246C2	WLVU
Beverly Hills	246A	292C3*	WXOF
Micanopy	249A	247C2	WRRX
Chiefland	247A	300A	WLQH

\* - §73.213(c) spacing to WEAG, Starke, Florida

Alternative Three

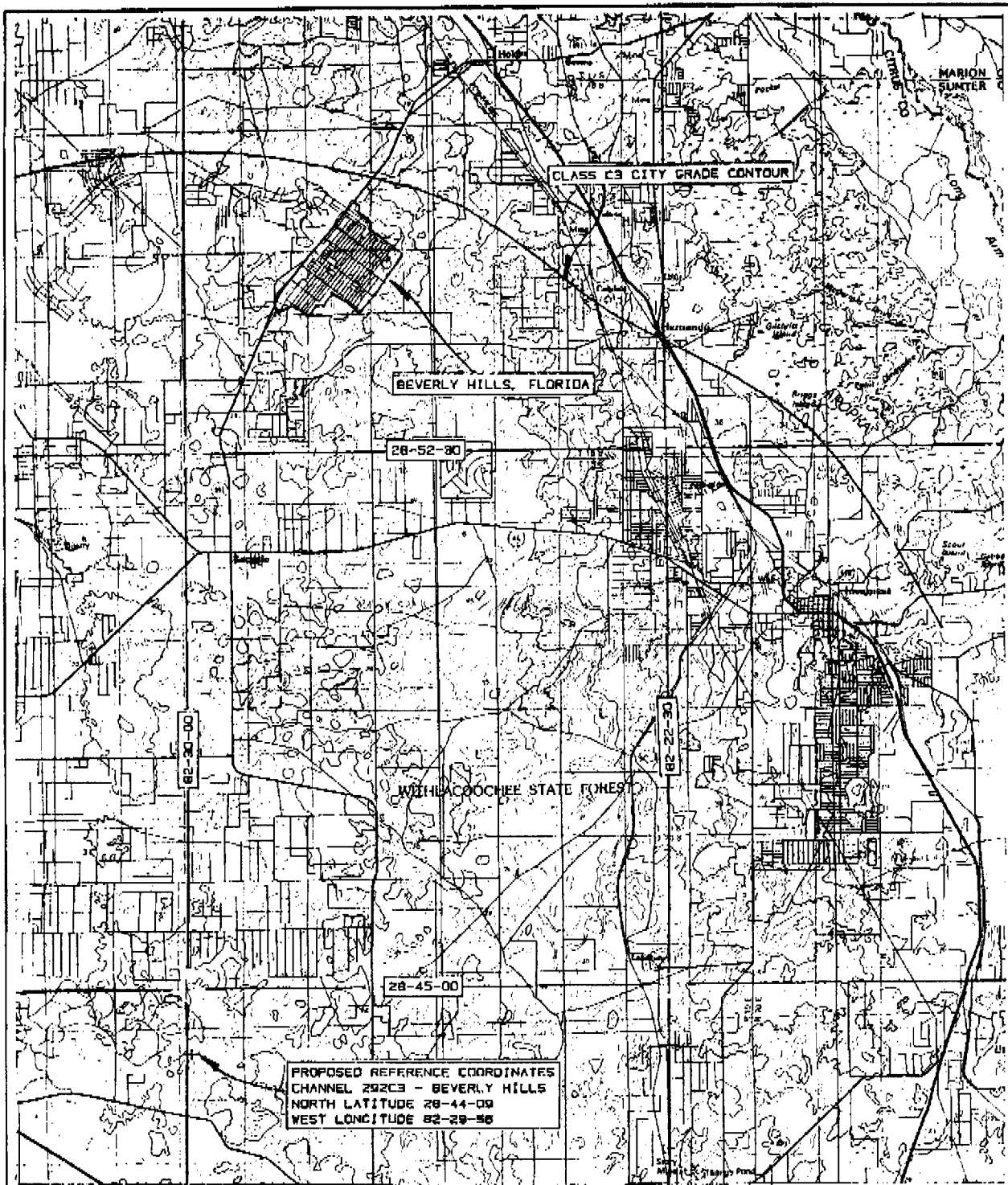
<u>Community</u>	<u>Present</u>	<u>Proposed</u>	<u>Station</u>
Sarasota	292A	293C2	WSRZ
Holiday	292A	246C2	WLVU
Beverly Hills	246A	----	WXOF
Sugarmill Woods	----	292C3	----
Inverness	----	292C3	----
	[alternate to Sugarmill Woods]		
Micanopy	249A	247C2	WRRX
Chiefland	247A	300A	WLQH

August 2, 1991. Likewise, Non-Commercial Educational stations which provide service to the area are rightfully considered as defined in the decision in MM Docket #88-259, June 10, 1992.

We have tried to be as accurate as possible in the preparation of this report. Should there be any questions concerning the information contained herein, we welcome the opportunity to discuss the matter by phone (912) 638-5608.

August 2, 1991. Likewise, Non-Commercial Educational stations which provide service to the area are rightfully considered as defined in the decision in MM Docket #88-259, June 10, 1992.

We have tried to be as accurate as possible in the preparation of this report. Should there be any questions concerning the information contained herein, we welcome the opportunity to discuss the matter by phone (912) 638-5608.



CLASS C3 CITY COVERAGE - ALTERNATIVE #2

MAP IS A PORTION OF THE USGS 100,000 SCALE TOPOGRAPHIC MAP 'INVERNESS'

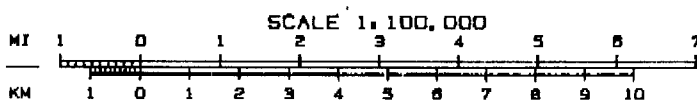


EXHIBIT #1  
MM DOCKET #92-195  
SARASOTA FM, INC.  
GATOR BROADCASTING, INC.  
Micanopy, SARASOTA,  
BEVERLY HILLS, HOLIDAY  
AND CHIEFLAND  
FLORIDA  
DECEMBER 1992

**BROMO** BROADCAST  
COMMUNICATIONS TECHNICAL CONSULTANTS  
St Simons Island, Georgia Washington, D.C.

REPLY COMMENTS OF  
SARASOTA-FM, INC.  
AND GATOR BROADCASTING CORPORATION  
MM DOCKET No. 92-195  
RM-7146  
December 1992

TERRAIN AND CONTOUR DATA  
PROPOSED CLASS C3 FACILITY  
BEVERLY HILLS, FLORIDA

ERP = 25 kW  
FM - 2-8 Tables

Azimuth Deg T.	Ave. Elev. 3 to 16 km Meters AMSL	Effective Antenna Height Meters AAT	ERP (dBk)	F(50-50) Distance to 70 dBu Contour km
0	15.8	99.2	13.979	23.1
30	27.3	87.7	13.979	21.8
60	25.3	89.7	13.979	22.0
90	25.5	89.5	13.979	22.0
120	23.1	91.9	13.979	22.3
150	27.7	87.3	13.979	21.7
180	20.8	94.2	13.979	22.6
210	6.5	108.5	13.979	24.1
240	1.3	113.7	13.979	24.7
270	0.4	114.6	13.979	24.7
300	1.1	113.9	13.979	24.7
330	4.8	110.2	13.979	24.3
Ave. = 15 M		100.0 M		

Antenna Radiation Center AMSL = 115.0 M

Geographic Coordinates:

North latitude: 28 44 09  
West longitude: 82 29 56

EXHIBIT #1A  
MM DOCKET #92-195  
SARASOTA FM, INC.  
GATOR BROADCASTING, INC.  
MICANOPY, SARASOTA,  
BEVERLY HILLS, HOLIDAY  
AND CHIEFLAND  
FLORIDA  
DECEMBER 1992



**BROMO COMMUNICATIONS, INC.**  
**Broadcast Technical Consultants**

**ANALYSIS OF HEART OF CITRUS**  
**UNDERSERVED AREA ANALYSIS**

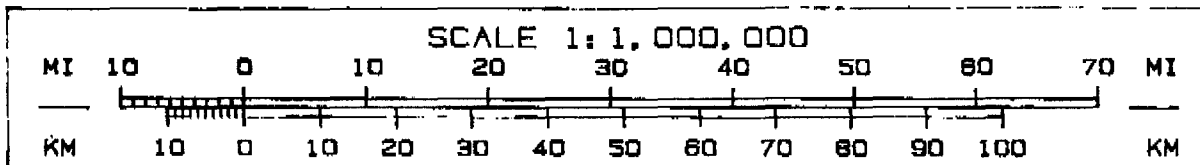
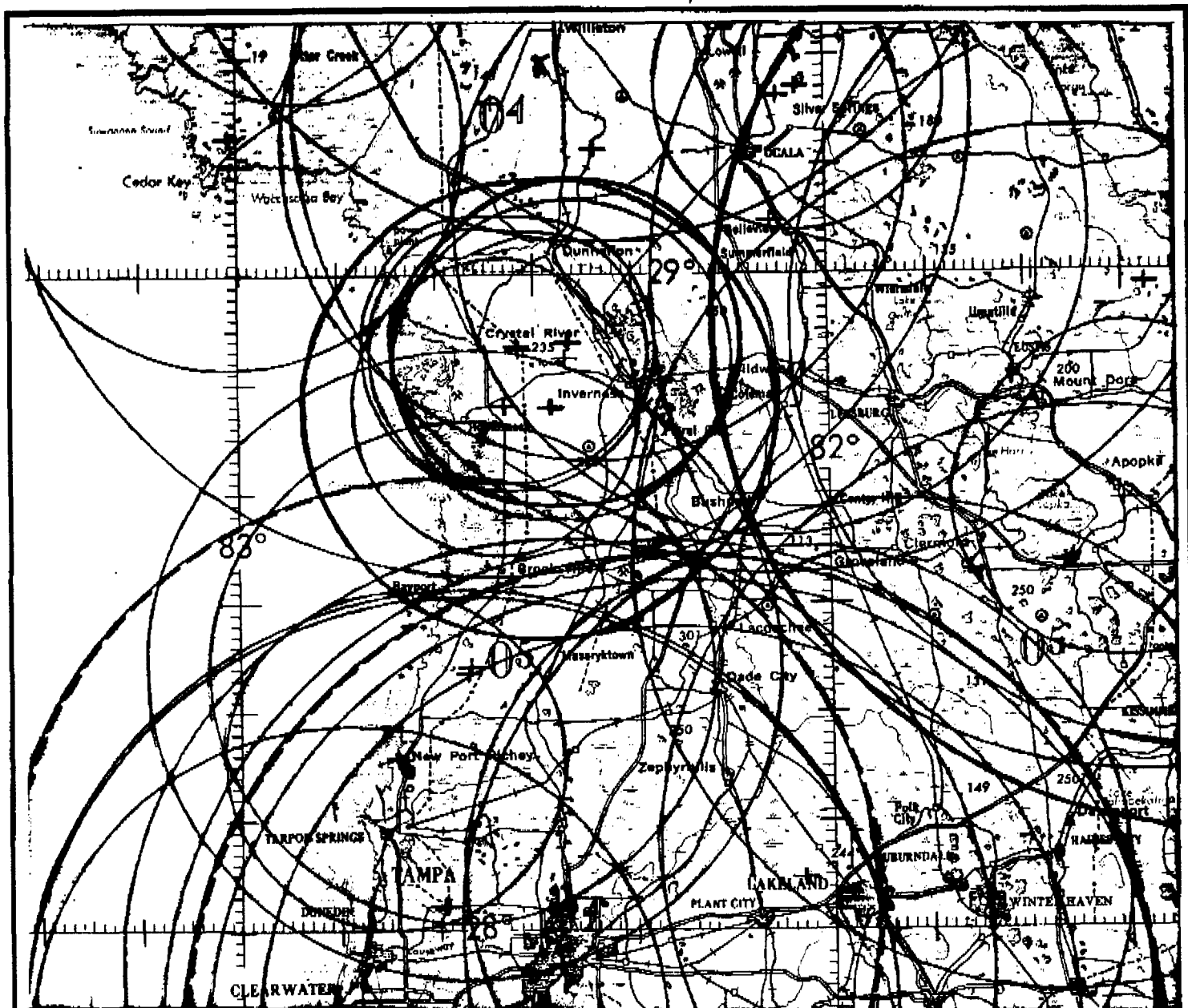
LATITUDE 28°46'42" LONGITUDE 82°28'31"

**FM STATIONS WITHIN 120 KM**

CHANNEL	KM	MI	BEARING	LAT / LONG	STATUS	PWR	CALL	ST	CITY
202A	12.49	( 7.76)	337.2	28-52-55/ 82-31-30	CP	3.80	WLMS.C	FL	Lecanto
205C1	43.79	( 27.21)	197.3	28-24- 7/ 82-36-30	CP	50.00	WYPE.C	FL	Tarpon Springs
209C1	105.43	( 65.51)	168.6	27-50-53/ 82-15-48	LI	100.00	WUSF	FL	Tampa
211A	10.48	( 6.51)	15.6	28-52- 9/ 82-26-47	CP	4.50	WWUA.C	FL	Inverness
213C1	109.03	( 67.75)	167.8	27-49- 8/ 82-14-26	LI	100.00	WBVM	FL	Tampa
216C1	88.51	( 54.99)	151.2	28- 4-46/ 82- 2-27	LI	100.00	WGIEFM	FL	Lakeland
218C2	45.00	( 27.96)	197.3	28-23-30/ 82-36-45	CP	25.00	WLPJ.C	FL	New Port Richey
220A	7.52	( 4.67)	286.2	28-47-50/ 82-32-56	CP	3.00	WXJC.C	FL	Crystal River
221A	71.42	( 44.38)	354.2	29-25- 4/ 82-32-58	LI	1.70	WFEZ	FL	Williston
223C2	109.15	( 67.82)	197.8	27-50-33/ 82-48-52	LI	50.00	WYUU	FL	Safety Harbor
225C2	49.99	( 31.06)	47.9	29- 4-45/ 82- 5-35	LI	50.00	WMFQ	FL	Ocala
227C	106.08	( 65.91)	168.6	27-50-32/ 82-15-46	LI	100.00	WFLZ	FL	Tampa
229C	86.58	( 41.37)	85.0	29-16- 6/ 82- 4-51	LI	100.00	WHMZ	FL	Ocala
231C1	103.82	( 64.57)	146.3	27-59-56/ 81-53-16	LI	100.00	WEZYFM	FL	Lakeland
233C	101.82	( 63.27)	76.9	28-56-55/ 81-27-18	LI	96.00	WCFB	FL	Daytona Beach
235C	109.03	( 67.75)	167.8	27-49- 9/ 82-14-26	LI	100.00	WYNFFM	FL	Tampa
237A	13.12	( 8.15)	337.2	28-53-14/ 82-31-39	LI	3.00	WXCV	FL	Homosassa Springs
237A	96.61	( 60.03)	98.1	28-39- 8/ 81-29-40	LI	3.00	WTLNFM	FL	Apopka
238A	69.72	( 43.32)	96.5	29-16-55/ 82- 2-50	LI	3.00	WGGOFM	FL	Silver Springs
239C1	102.34	( 63.59)	188.2	27-52- 0/ 82-37-27	LI	100.00	WMTXFM	FL	Clearwater
247A	91.23	( 56.89)	334.2	29-30-60/ 82-53-11	CP	6.00	WLOHFM	FL	Chiefland
248C	115.76	( 71.94)	128.5	28- 7-35/ 81-33- 3	LI	100.00	WPCV	FL	Winter Haven
250C1	84.01	( 52.20)	192.2	28- 2-21/ 82-39-21	LI	100.00	WXTB	FL	Clearwater
253C	54.14	( 33.64)	350.5	29-15-32/ 82-34- 3	LI	100.00	WKTK	FL	Crystal River
258C1	92.36	( 57.39)	179.1	27-58-50/ 82-27-35	LI	100.00	WQYKFM	FL	St. Petersburg
264C1	84.01	( 52.20)	192.2	28- 2-21/ 82-39-21	LI	100.00	WUSAFM	FL	Tampa
268C	106.08	( 65.91)	168.6	27-50-32/ 82-15-46	LI	100.00	WKES	FL	St. Petersburg
270C1	113.63	( 70.61)	81.7	28-55-16/ 81-19- 9	LI	28.00	WJHM	FL	Daytona Beach
272C2	46.17	( 28.69)	9.8	29-11-16/ 82-23-39	LI	50.00	WTRSFM	FL	Dunnellon
274C3	70.77	( 43.98)	312.4	29-12-24/ 83- 0-51	CP	25.00	WVNM.C	FL	Cedar Key
279C1	103.76	( 64.47)	4.3	29-42-34/ 82-23-40	LI	100.00	WRUFFM	FL	Gainesville
284C1	92.36	( 57.39)	179.1	27-56-50/ 82-27-35	LI	100.00	WRBQFM	FL	Tampa
288A	62.91	( 39.09)	203.5	28-15-32/ 82-43-54	CP	6.00	WGULFM	FL	New Port Richey
288A	94.90	( 58.97)	3.1	29-37-52/ 82-25-18	LI	3.00	WYKS	FL	Gainesville
290C	113.63	( 70.61)	81.7	28-55-16/ 81-19- 9	LI	100.00	WOCL	FL	Deland
294C1	89.33	( 55.51)	105.6	28-33-31/ 81-35-36	LI	100.00	WXXL	FL	Leesburg
297C1	103.44	( 64.27)	188.1	27-51-24/ 82-37-26	LI	100.00	WWRM	FL	St. Petersburg
299C	113.63	( 70.61)	81.7	28-55-16/ 81-19- 9	LI	100.00	WMGP	FL	Mount Dora

Note: Stations on Channels 201-220 considered as authorized  
 Class C stations considered as authorized  
 Class A, C3, C2, C1 stations considered at maximum facility

**EXHIBIT #2**  
**MM DOCKET #92-195**  
**SARASOTA FM, INC.**  
**GATOR BROADCASTING, INC.**  
**MICANOPY, SARASOTA,**  
**BEVERLY HILLS, HOLIDAY**  
**AND CHIEFLAND**  
**FLORIDA**  
**DECEMBER 1992**

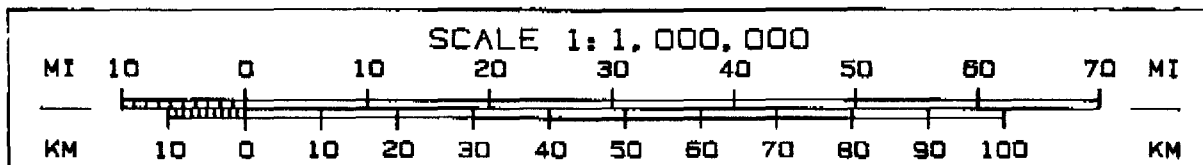
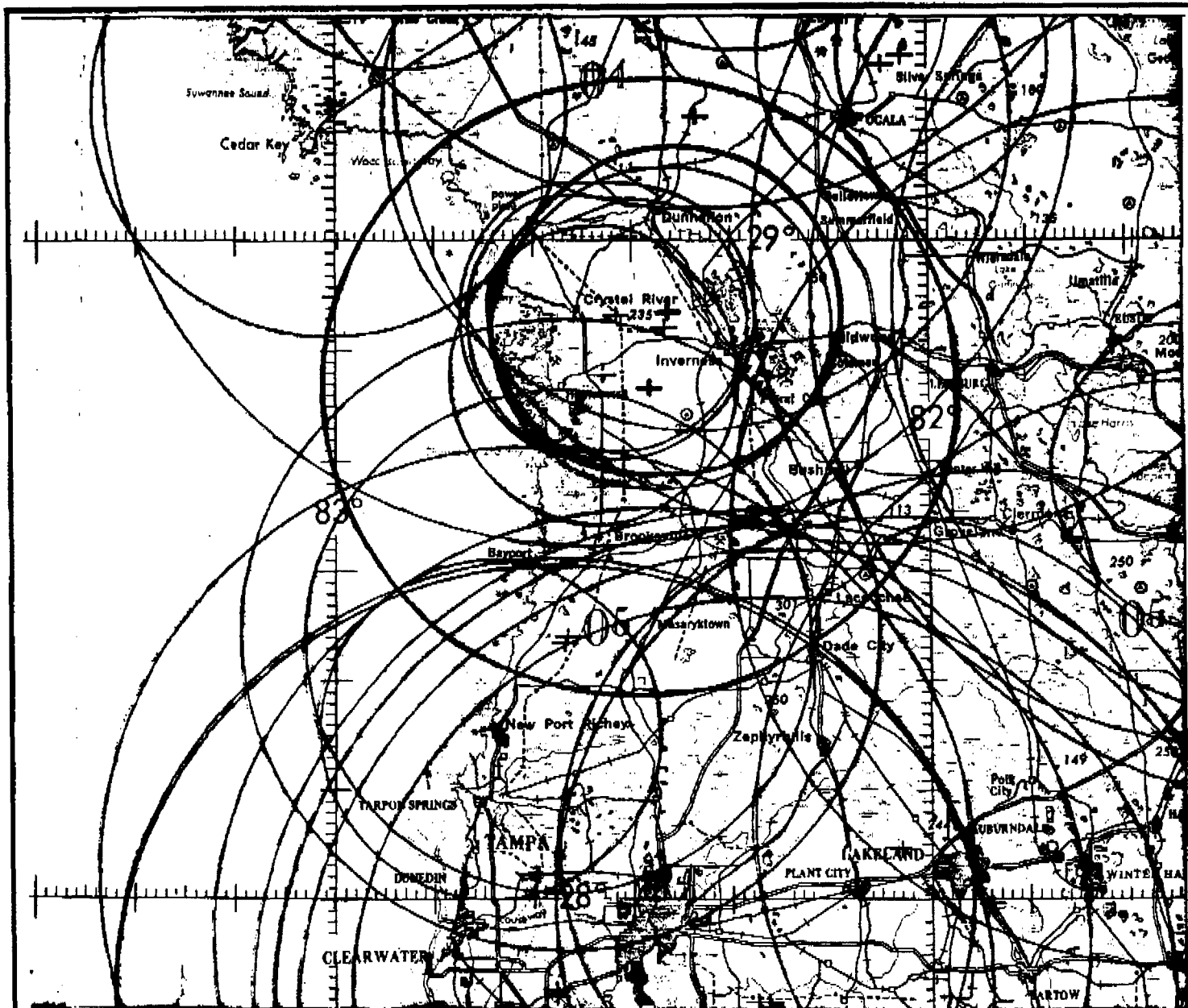


AREA SERVICE STUDY - 246C3

MAP IS A PORTION OF THE 1,000,000 SCALE  
WAC AERONAUTICAL CHART CH-25

EXHIBIT #3  
MM DOCKET #92-195  
SARASOTA FM, INC.  
GATOR BROADCASTING, INC.  
MICANOPY, SARASOTA,  
BEVERLY HILLS, HOLIDAY  
AND CHIEFLAND  
FLORIDA  
DECEMBER 1992

**BROMO**  
COMMUNICATIONS  
BROADCAST  
TECHNICAL CONSULTANTS  
St Simons Island, Georgia  
Washington, D.C.



AREA SERVICE STUDY - 243C2

MAP IS A PORTION OF THE 1,000,000 SCALE  
WAC AERONAUTICAL CHART CH-25

EXHIBIT #4  
MM DOCKET #92-195  
SARASOTA FM, INC.  
GATOR BROADCASTING, INC.  
MICANOPY, SARASOTA,  
BEVERLY HILLS, HOLIDAY  
AND CHIEFLAND  
FLORIDA  
DECEMBER 1992

**BROMO**  
**COMMUNICATIONS**  
St Simons Island, Georgia  
BROADCAST  
TECHNICAL CONSULTANTS  
Washington, D.C.

AFFIDAVIT AND QUALIFICATIONS OF CONSULTANT

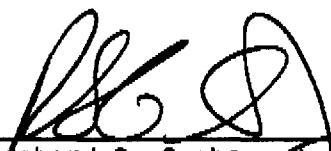
State of Georgia )  
St. Simons Island ) ss:  
County of Glynn )

RICHARD S. GRAHAM, JR. being duly sworn, deposes and says that he is an officer of Bromo Communications, Inc. Bromo has been engaged by Sarasota-FM, Inc., and Gator Broadcasting Corporation to prepare the attached Technical Exhibit.

His qualifications are a matter of record before the Federal Communications Commission. He is a graduate of Auburn University and has been active in broadcast engineering since 1972.

The attached report was either prepared by him or under his direction and all material and exhibits attached hereto are believed to be true and correct.

This the 7th day of December, 1992.

  
\_\_\_\_\_  
Richard S. Graham, Jr.  
Affiant

Sworn to and subscribed before  
me this the 7th day of December, 1992.

  
\_\_\_\_\_  
Notary Public, State of Georgia  
My Commission Expires: September 8, 1995

## CERTIFICATE OF SERVICE

The undersigned, an employee of Haley, Bader & Potts, hereby certifies that the foregoing document was mailed this date by First Class U.S. Mail, postage prepaid, or was hand-delivered\*, to the following:

\*Michael C. Ruger, Chief  
Allocations Branch, Policy & Rules Division  
Federal Communications Commission  
2025 M Street, N.W.  
Room 8318  
Washington, D.C. 20554

\*Robert Hayne  
Mass Media Bureau  
Federal Communications Commission  
2025 M Street, N.W.  
Room 8337  
Washington, D.C. 20554

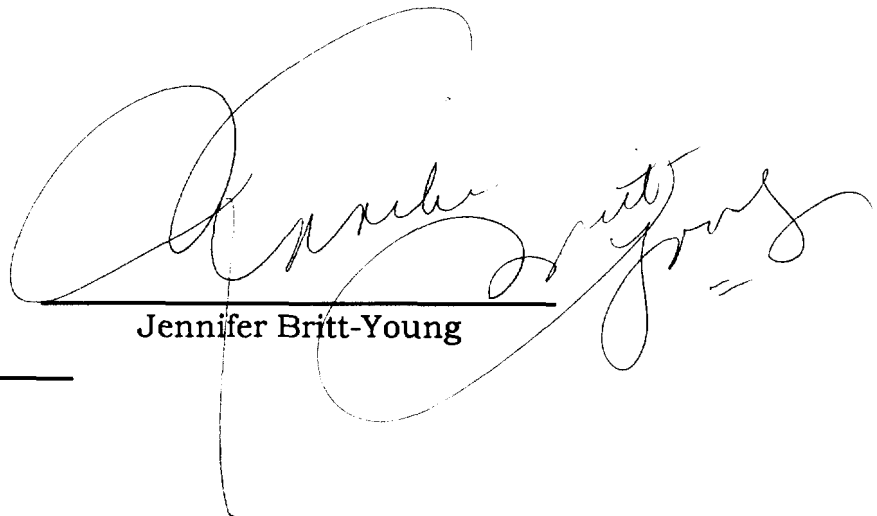
John M. Spencer, Esq.  
Leibowitz & Spencer  
One S.E. Third Avenue  
Suite 1450  
Miami, FL 33131  
Counsel for Women in Florida Broadcasting  
and Highlands Media Company, Inc.

Dennis F. Begley, Esq.  
Matthew M. McCormick, Esq.  
Reddy, Begley & Martin  
1001 22nd Street, N.W.  
Suite 350  
Washington, D.C. 20037  
Counsel for Pasco Pinellas Broadcasting Co.

A. Wray Fitch, III, Esq.  
Gammon & Grange  
8280 Greensboro Drive  
McLean, VA 22102  
Counsel for Heart of Citrus, Inc.

Peter Guttmann, Esq.  
Pepper & Corazzini  
1776 K Street, N.W.  
Suite 200  
Washington, D.C. 20006  
Counsel for Radio Station WLQH

Irving Gastfreund, Esq.  
Kaye, Scholer, Fierman, Hays & Handler  
901 15th Street, N.W.  
Washington, D.C. 20005  
Counsel for WGUL-FM, Inc. and  
Roper Broadcasting, Inc.



Jennifer Britt-Young

---

\*Hand Delivered

December 7, 1992